

1 SHOOK, HARDY & BACON LLP
Michael L. Mallow (SBN 188745)
2 mmallow@shb.com
Rachel A. Straus (SBN 268836)
3 rstraus@shb.com
2049 Century Park East, Suite 3000
4 Los Angeles, CA 90067
Tel: (424) 285-8330
5 Fax: (424) 204-9093

6 *Attorneys for Defendant*
American Honda Motor Co. Inc.
7

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10

11 BILL SCHEPLER and ADRIAN
12 GARCIA, individually and on behalf of)
13 all others similarly situated,)

14 Plaintiff,)

15 vs.)

16 AMERICAN HONDA MOTOR CO.,)
17 INC.,)

18 Defendant.)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

Case No. CV 18-6043-GW-AFMx

Assigned to: Hon. George H. Wu

**STIPULATION TO STAY CLASS
CERTIFICATION DEADLINES FOR
ONE MONTH; AND ORDER**

Third Amended Complaint Filed: August
9, 2019

1 In light of the current public health crisis relating to the coronavirus pandemic¹,
 2 Plaintiffs Bill Schepler and Adrian Garcia (“Plaintiffs”) and Defendant American
 3 Honda Motor Co., Inc., (“AHM”) (collectively “Parties”) in the above-captioned
 4 matters stipulate and agree as follows:

5 WHEREAS pursuant to the Court’s October 11, 2019 Order (Dkt. # 72),
 6 Plaintiffs filed their motion for class certification on March 9, 2020, including three
 7 expert reports;

8 WHEREAS per the Court’s October 11, 2019 order, the remaining
 9 briefing/hearing schedule for Plaintiffs’ motion for class certification is as follows:

- 10 • **April 8, 2020:** Deadline for AHM to file its Opposition to Plaintiffs’
 11 Motion for Class Certification and Expert Reports.
- 12 • **April 29, 2020:** Deadline for Plaintiffs to file Reply ISO Motion for
 13 Class Certification.
- 14 • **May 11, 2020 at 8:30 a.m.:** Hearing on Plaintiffs’ Motion for Class
 15 Certification.

16 WHEREAS during this time, both parties expect to take expert depositions,
 17 which would require travel, and may require attendees to sit in close quarters during
 18 the depositions;

19 WHEREAS, due to office closures, including AHM’s outside counsel’s office,
 20 school closures, and other impacts of the virus on daily life, the ability of many of the
 21 experts, staff, and attorneys involved in this action to devote the necessary resources
 22 to this case has been compromised;

23 WHEREAS the parties met and conferred and agreed for the health and safety
 24 of everyone involved in this case, subject to Court approval, to stay the class
 25 certification deadlines for one month;

26 _____
 27 ¹ On March 11, 2020 the World Health Organization declared the coronavirus
 28 (COVID-19) a global pandemic. (<https://www.who.int/dg/speeches/detail/who-director-general-s-opening-remarks-at-the-media-briefing-on-covid-19---11-march-2020>)

1 WHEREAS the parties further agree, subject to Court approval, that, on or
2 before April 13, 2020, the parties will file a stipulation with a proposed revised
3 briefing schedule.

4 IT IS HEREBY STIPULATED by and between the parties, through their
5 respective undersigned counsel, and subject to Court approval, to stay class
6 certification deadlines for one month and to submit a proposed revised briefing
7 schedule to the Court on or before April 13, 2020.

8
9 Dated: March 19, 2020

Respectfully submitted,

10 /s/ Rachel A. Straus

11 Michael L. Mallow

Rachel A. Straus

12 SHOOK, HARDY & BACON LLP

13 *Attorneys for Defendant American
Honda Motor Co. Inc.*

14
15 Dated: March 19, 2020

Respectfully submitted,

16 /s/Kolin Tang

17 James C. Shah

Kolin Tang

18 SHEPHERD, FINKELMAN, MILLER
& SHAH, LLP

19 Robert W. Murphy

MURPHY LAW FIRM

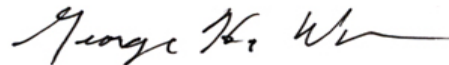
20 Ryan R. Frasher

21 THE FRASHER LAW FIRM PC

22 *Attorneys for Plaintiffs and the
Proposed Class*

23 **SO ORDERED:**

24
25 DATED: March 18, 2020



26 HON. GEORGE H. WU,
27 United States District Judge
28